

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JOHN COSTANZO JR. and
MANUEL RECIO,

Defendants.

Case No. 22 Cr. 281 (JPO)

**DECLARATION OF TORREY K. YOUNG
IN SUPPORT OF DEFENDANTS' OMNIBUS MOTIONS *IN LIMINE***

Pursuant to 28 U.S.C. § 1746, I, Torrey K. Young, declare as follows:

1. I am an attorney admitted to practice before this Court and a partner with the law firm Mukasey Frenchman LLP.
2. I am counsel of record for Defendant John Costanzo, Jr. in the above-captioned action.
3. I submit this declaration in support of Defendants John Costanzo, Jr.'s and Manuel Recio's Omnibus Motions *in Limine*.
4. Pursuant to Local Criminal Rule 16.1, undersigned counsel certifies that: (i) my firm colleagues and I have conferred with counsel for the government in a good faith effort to resolve the issues raised in Point I of Defendants' Memorandum of Law in support of Defendants John Costanzo, Jr.'s and Manuel Recio's Omnibus Motions *in Limine*, and (ii) the parties have been unable to reach agreement.
5. Attached as Exhibit A is a copy of the government's letter dated September 12, 2023.

6. Attached as Exhibit B is a copy of [REDACTED]
[REDACTED].
7. Attached as Exhibit C is a copy of [REDACTED]
[REDACTED].
8. Attached as Exhibit D is a copy of [REDACTED]
[REDACTED].
9. Attached as Exhibit E is a copy of [REDACTED]
[REDACTED].
10. Attached as Exhibit F is a copy of [REDACTED].
11. Attached as Exhibit G is a copy of an email thread between defense counsel and the government.
12. Attached as Exhibit H is a copy of an email thread between defense counsel and the government.
13. Attached as Exhibit I is a copy of [REDACTED]
[REDACTED].
14. Attached as Exhibit J is an excerpt of a copy of [REDACTED]
[REDACTED].
15. Attached as Exhibit K is an excerpt of a copy of the transcript of a July 15, 2022 hearing before the Court in this action.
16. Attached as Exhibit L is a copy of the government's letter dated September 11, 2023.
17. Attached as Exhibit M is a copy of [REDACTED]
[REDACTED].

18. Attached as Exhibit N is a copy of [REDACTED]

[REDACTED].

19. Attached as Exhibit O is an excerpt of a copy of the transcript of a June 15, 2023 hearing before the Court in this action.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
September 27, 2023

/s/ Torrey K. Young
Torrey K. Young

MUKASEY FRENCHMAN LLP
570 Lexington Avenue, Suite 3500
New York, New York 10022
Tel: (212) 466-6400
torrey.young@mfsllp.com

Counsel for Defendant John Costanzo Jr.